

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSINU.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2010 FEB -9 P 2:31

UNITED STATES OF AMERICA,

JON W. SANFILIPPO
CLERK

Plaintiff,

v.

10-CR-022

2010-CR-

[18 U.S.C. §§ 1028A(a)(1), 1343, and
1708]

THOMAS P. CHICOINE,

Green Bay Division

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

Allegations Common to All Counts

1. Beginning in or about January 2008 and continuing to April 2008, in the State and Eastern District of Wisconsin and elsewhere,

THOMAS P. CHICOINE

and others known and unknown to the grand jury devised and carried out a scheme to defraud and to obtain money by means of material false and fraudulent pretenses and representations (hereinafter the "scheme"), which scheme is more fully described below.

2. Through his scheme, Chicoine sought to defraud private individuals as well as various banks and credit card companies including Bank of America, Washington Mutual Bank, and Green Dot Corporation.

3. For purposes of executing his scheme, Chicoine used and caused the use of wire communications including the internet and telephone as described below.

The Scheme to Defraud

4. Chicoine's scheme was essentially as follows:

(a) Chicoine obtained personal identifying information of others, including their name, address and social security number; took U.S. Mail addressed to others including credit card offers and other financial matters; and fraudulently and without authorization used the personal identifying information of others to apply for accounts at Bank of America and Washington Mutual, to obtain credit cards from Green Dot Corporation, and loans from internet loan companies.

(b) It was further part of the scheme to defraud that beginning in January 2008 Chicoine used these fraudulent accounts and credit cards to conduct wire transfers between accounts and make cash withdrawals at automatic teller machines.

Executing the Scheme to Defraud**COUNTS ONE THROUGH THREE****THE GRAND JURY FURTHER CHARGES:**

On or about the dates listed below, in the Eastern District of Wisconsin, the defendant knowingly and intentionally executed the scheme to defraud by transmitting and causing to be transmitted in interstate commerce, the following wire communications:

Count	Date	Execution of Scheme to Defraud
One	2/5/2008	Chicoine used a cellular telephone in or around Neenah, WI to add U.S. currency to a Visa account maintained by Green Dot located in Monrovia, California, using the personal identifying information of G.K.
Two	2/13/2008	Chicoine used a computer in Oshkosh, WI to apply for and receive a credit account maintained by Bank of America located in Phoenix, Arizona, using the personal identifying information of H.S.

Three	2/19/2008	Chicoine used a computer in Oshkosh, WI to apply for and receive a \$300 loan from MTE Financial located in Miami, Oklahoma, using the personal identifying information of J.B.
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Each in violation of Title 18, United States Code, Section 1343.

Count Four

[Aggravated Identity Theft]

THE GRAND JURY FURTHER CHARGES:

On February 19, 2008, in the State and Eastern District of Wisconsin and elsewhere,

Thomas P. Chicoine

did knowingly use a means of identification of another person without lawful authority, namely, Social Security number: xxx-xx-7710, assigned to J.B., during and in relation to wire fraud in violation of Title 18, United States Code, Section 1343, as charged in Counts One through Three of this indictment.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

Count Five**[Theft of Mail]****THE GRAND JURY FURTHER CHARGES:**

On or about February 26, 2008, in the State and Eastern District of Wisconsin and elsewhere,

Thomas P. Chicoine

received, concealed, and unlawfully had in his possession the following letters knowing these letters had been stolen from or out of any mail, post office, or authorized depository for mail matter:

ADDRESS	SENDER
H.S. XXXX Westmoor Rd, Oshkosh, WI 54904-7700	N/A-Colonial National Mortgage
J.B. XXXX Grassy Ln Neenah, WI 54956	PO Box 84020 Columbus, GA 31980 (Green Dot card)
H.S. XXXX Westmoor Rd. Oshkosh, WI 54904-7700	HSBC Bank Nevada PO Box 280 Wood Dale, IL 60191
G.K. XXXX Boyd Street Oshkosh, WI 54904	PO Box 84020 Columbus, GA 31908 (Green Dot card)


All in violation of Title 18, United States Code, Section 1708.

A TRUE BILL:

FOREPERSON

Dated:

2/9/10


JAMES L. SANTELLE
United States Attorney